

## REMARKS

Claims 1-4 are pending in the application. Claim 1 is the independent claim.

The Office Action rejected Claims 1 and 3 under 35 U.S.C. 102(e) as being anticipated by Chang (US. Pub. No. 2001/0030953). The Office Action also rejected Claim 2 under 35 U.S.C 103(a) as being unpatentable over Chang, Madour I (U.S. Pub. No. 2003/0053431), Madour II (U.S. Pub. No. 2003/0021681), and Sayeedi (U.S. Pub. 2002/0193113). Claim 4 was rejected under 35 U.S.C. 103(a) as being unpatentable over Chang and Sayeedi.

Applicant respectfully disagrees, but has amended the claims in order to expedite prosecution of the case.

In general, Chang provides a method for performing a handoff on voice and packet data according to movement of a mobile station (MS) from a first base station (BS) to a second BS in a mobile communication system, including the first BS communicating the voice and packet data with the MS, a mobile switching center (MSC) connected to the first BS, and the second BS adjacent to the first BS.

In general, the present invention provides an intra-PDSN handoff performing method capable of providing seamless packet data services by substituting a soft handoff for a hard handoff from a source base station controller (S-BSC) to a target base station controller (T-BSC) and performing the soft handoff, providing packet data services in an active mode by maintaining the S-BSC as an anchor and establishing a link of a packet access network in a dormant mode.

In particular, Chang discloses a soft hand-off method for providing concurrent services using an MSC. As described in paragraphs 8-10, 84-85 and 95-96 and Figs. 1 and 2 of Chang, in order to provide the concurrent service, the MSC controls the S-BSC and the T-BSC. In contrast, the present invention provides a method for performing a fast intra-packet data service node (PDSN) soft handoff to provide high-speed/high-quality real-time data services without

data loss in an active packet mode. (See Applicant's specification, page 7, lines 6-15 and page 8, lines 3-20.) The present invention performs soft hand-off between the S-BSC and the T-BSC without using an MSC and uses a channel link between the BSC and the Packet Control Function (PCF) to service the packet data. (See Fig. 2 of Applicant's application.)

Amended Claim 1 includes the feature of performing a soft hand-off between the S-BSC and the T-BSC without using an MSC as highlighted in Claim 1 below:

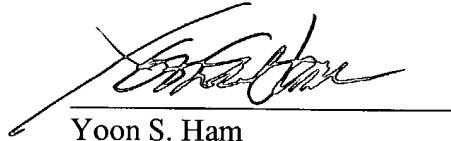
1. A method for performing an intra-packet data service node (PDSN) soft handoff, comprising the steps of:
  - (h) setting up a channel passing through a target base station controller (T-BSC), a source base station controller (S-BSC) and a PDSN by establishing a direct channel link between the S-BSC and the T-BSC in an active packet session mode;
  - (i) performing a handoff between the S-BSC and the T-BSC without using a mobile switching center (MBC);**
  - (j) transmitting or receiving user packet data exchanged between a mobile station (MS), and the S-BSC and the T-BSC to or from the PDSN through the established channel link; and
  - (k) sending or receiving user packet data exchanged between the MS and the T-BSC to or from the PDSN through the established channel link when the handoff is completed.

In light of the above explanation, the cited references do not suggest or teach the invention as claimed in Claim 1. Therefore, Claim 1 is patentable over the cited art. Claims 2-4 depend on Claim 1, and are thus also patentable.

Applicants believe the objections and rejections in the Office Action have been addressed and that the application is now in condition for allowance. The Examiner is invited to contact the undersigned by telephone should the Examiner believe that personal communication will expedite prosecution of this application.

Respectfully submitted,

PIPER RUDNICK LLP

A handwritten signature in black ink, appearing to read 'Yoon S. Ham', is written over a horizontal line.

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